**Kathleen Grillo** Vice President Federal Regulatory



1300 I Street, NW, Suite 400 West Washington, DC 20005

Phone 202 515-2533 Fax 202 336-7922 kathleen.m.grillo@verizon.com

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## **EX PARTE**

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

RE: Jurisdictional Separations and Referral to the Federal-State Joint Board, CC Docket No. 80-286

Dear Ms. Dortch:

On March 14, 2006, Kathleen Grillo and Ann Rakestraw of Verizon met with Dana Shaffer, Acting Legal Advisor to Commissioner Deborah Taylor Tate, to discuss the above-referenced proceeding.

Verizon stated that the FCC can and should extend the current separations freeze on an interim basis and at the same time issue a Notice of Proposed Rulemaking seeking comment on the procedural and substantive issues associated with separations reform. Verizon also stated that the FCC should not attempt to review certain elements of separations in isolation (such as costs for special access) before extending the freeze. Considering substantive reform issues in piecemeal or without sufficient time for industry participation and input will have unintended consequences and could have unexpected ripple effects to other portions of the separations rules. Verizon also discussed the *White Paper* filed by USTelecom on December 12, 2005, as well as USTelecom's *ex parte* submission dated March 13, 2006.

Pursuant to Section 1.1206(b) of the Commission's rules, one electronic copy of this notice is being filed in the above-referenced proceeding.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

cc: Dana Shaffer

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